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Juan Arambula, Chairman
Supervisor, District 3
Board of Supervisors



June 23, 1998

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814
Attn: Mr. Rick Breitenbach

Dear Mr. Breitenbach:

The Fresno County Board of Supervisors submits the following comments on the CALFED Bay-Delta Program Draft Programmatic EIS/EIR:

1. Fresno County supports the goals of the program, especially the components related to increased water supply, quality, and reliability. Substantial portions of the water supplies for Fresno County come from the Delta and their quantity, quality and reliability are essential in maintaining the economy and welfare of the citizens of the County.
2. As the current supply of developed water shifts from agricultural uses to urban and environmental uses, water for agricultural use will decrease, unless the overall statewide water supply is increased. The shift of developed water from agricultural use will have a detrimental impact on Fresno County, the #1 agricultural County in the Nation.
3. The CALFED process needs to: provide additional water storage and conveyance facilities with the flexibility to meet future water needs; look at long term, statewide impacts including groundwater overdraft; and be tied to development of the State Water Plan with the involvement of local water agencies. Alternatives II and III are the best vehicles to accomplish these goals.
4. Alternatives II and III, or a combination thereof, provide additional storage south of the Delta and would best meet the needs of Fresno County, however, the six Program Elements leading to the Alternatives need to be revised to address issues relevant to the County, including the following:
 - a) The County cannot support a process that demands water marketing and specific efficiency goals before proceeding with storage and reliability actions. Demand-side management and market-mechanisms to yield water for the Delta would be detrimental to Fresno County agricultural interests because it is likely the water would leave Fresno County to areas whose customers can and will pay more. Any

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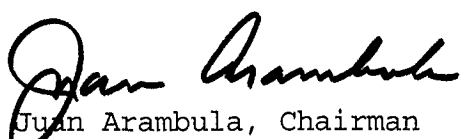
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Page 2

transfer of water out of Fresno County, short term or long term, should be avoided until assurances are in place that Fresno County will not be asked to market water until after groundwater deficit areas are properly mitigated. Water yielded locally by marketing or conservation concepts should be distributed locally to help offset the County's substantial groundwater overdraft. The Program should develop phasing and implementation processes that evaluate demand-side potential and move to reliability and storage alternatives when the scope of an overdraft problem is as significant as in Fresno County.

- b) Market water transfers, particularly independent of Districts, will negatively impact the ability to control and manage the water resource. Water transfers should only be considered for historical, short term transfers, unless the transfer is tied to a long term solution of state water problems. Any transfer process considered should provide for County input.
- c) The process needs to evaluate water storage and conjunctive use projects in Fresno County and provide funding opportunities for such projects. Any Program activities that negatively impact Fresno County groundwater or exacerbate the overdraft situation in the County should not be considered without assurances that specific mitigation measures will be implemented.
- d) The retirement of agricultural land, as proposed in the CALFED process, presents a multitude of real and potential problems such as environmental hazards, loss of tax revenue and third party economic impacts. Land retirement must be approached very carefully, agricultural lands should only be considered for retirement if they are of such marginal value to the agricultural economy that the benefits of retirement will substantially outweigh efforts to maintain agricultural productivity. Removing productive or potentially productive land from agricultural production conflicts with the goals and objectives of the Fresno County General Plan.

Thank you for your attention to this matter.

Sincerely,



Juan Arambula, Chairman
Fresno County Board of Supervisors

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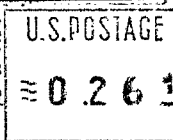
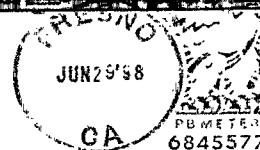
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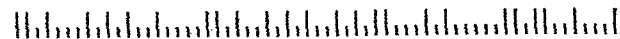
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